model includes a measure of the cost of unbundled loops (C_L). By including both of these variables in the empirical model, it is possible to estimate the unique contributions of loop price and loop cost on availability. In other words, the estimated effect of loop price on availability is determined holding cost constant, so any effect of price on availability and competitive choice is independent of the correlation between availability and costs.

Since the availability variables (A_i) are both defined as a percentage, estimation is conducted using the Minimum Logit Chi-Square ("MLC") method (Berkson 1953; Maddala 1983).[19] The estimated regression is

$$\ln\left(\frac{A_i}{1-A_i}\right) = \beta_1 \ln P_L + \beta_2 \ln C_L + \beta_3 \ln INC + \beta_4 \ln BIGCITY + \beta_5 RURAL + \sum_{m=6}^{14} \beta_m D_m + \varepsilon \qquad (1)$$

where D are time and Bell Company specific dummy variables (three time and five Bell dummies) and i is either U or C (our *universality* and *competitive* availability indexes). The logarithmic functional form for the explanatory variables is selected based on Godfrey *et al.* (1988).[20] The MLC method is estimated by weighted least squares.[21] Two versions of Equation (1) are estimated. The first employs A_U as the dependent variable (the percent of zip codes with at least one broadband provider) while in the second regression the dependent variable is A_C (the percent of zip codes with at least four broadband providers). In other respects, the models are identical.

There are three possible results from this regression: (a) that higher loop rates promote broadband availability ($\beta_1 > 0$); (b) that higher loop rates retard broadband availability ($\beta_1 < 0$); or (c) that loop rates have no (measurable) relationship to broadband availability ($\beta_1 = 0$). The magnitude of the estimated

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19 J. Berkson, A Statistically *Precise and Relatively Simple Method of Estimating the Bio-Assay with Quantal Response, Based on the Logistic Function,* 48 JOURNAL OF THE AMERICAN STATISTICAL ASSOCIATION at 565-99; G. S. Maddala, LIMITED-DEPENDENT AND QUALITATIVE VARIABLES IN ECONOMETRICS (1983).

20 Godfrey, L. G., M. McAleer and C. R. McKenzie, *Variable Addition and Lagrange Multiplier Tests for Linear and Logarithmic Regression Models,* REVIEW OF ECONOMICS AND STATISTICS, 70 (3), pp. 492-503 (1988).

21 Maddala, *supra* n. 19, at 30.

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coefficient β_1 can be used to quantify the relationship between loop prices and availability.

Notably, regulations to date have required loop prices to equal forward-looking costs. By including as a regressor an estimate of forward-looking cost that is void of state-specific regulatory and political idiosyncrasies, the empirical model estimates the effect of price on broadband availability independent of the cost of component of the price. Given that both price and cost are included as regressors, it is also possible to interpret the effect of price as the aggressiveness with which state commissions have established cost-based rates. As the FCC and long-established case law recognize, forward-looking cost must be estimated so that the end rate falls within a "zone of reasonableness" (*i.e.*, the rate can neither be confiscatory nor excessive).[22] Some state commissions may draw from the lower end of the zone of reasonableness while others the higher end. The particular specification used by the model herein allows us to measure the impact of these pricing decisions by the state commission.

A. *Specification Issues*

To provide confidence in this chosen specification, the analysis subjects the empirical model to the specification test RESET. RESET is capable of detecting a variety of specification errors including omitted variables and incorrect function form.[23] The null hypothesis of RESET is "no specification error," so specification error is indicated only if the null is rejected. The RESET F-Statistic is well below the critical value for both regression models providing evidence that specification error is not a problem. RESET is also recommended by Gilchrest *et al.* (1988) in selecting a particular functional form, and the analysis also employs RESET in this way to finalize the specification. White's test for heteroscedasticity

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22 *In the Matter of Joint Application by SBC Communications Inc., Southwestern Bell Telephone Company, and Southwestern Bell Communications Services, Inc. d/b/a Southwestern Bell Long Distance for Provision of In-Region, InterLATA Services in Kansas and Oklahoma,* Memorandum and Order, FCC 01-29, ___ FCC Rcd ___ (rel. January 22, 2001)at ¶ 81-82; *In the Matter of Application of Verizon New England Inc., Bell Atlantic Communications, Inc. (d/b/a Verizon Long Distance), NYNEX Long Distance Company (d/b/a Verizon Enterprise Solutions) And Verizon Global Networks Inc., For Authorization to Provide In-Region, InterLATA Services in Massachusetts,* Memorandum and Order, FCC 01-130 ___ FCC Rcd ___ (rel. April 16, 200) at ¶¶ 22-27; *Farmers Union Cent. Exch., Inc. v. FERC,* 734 F.2d 1486, 1504 (D.C. Cir. 1984) (holding that the concept of "just and reasonable" must clearly be more than a "mere vessel into which meaning must be poured").

23 D. Gujarati, BASIC ECONOMETRICS (1995) at 464-6.

does indicate that the regression disturbances are not homoscedastic (despite the MLC estimation technique), so White's robust standard errors are used to compute the t-statistics.[24]

The fact the prices should be "based on cost" may result in a relatively high correlation between loop price and loop cost variables. Analysis finds that that is the case – loop prices and costs have a simple linear correlation coefficient of 0.79 ($\rho = 0.79$). This collinearity does not bias the estimated coefficients in our model, although it does reduce the efficiency of our estimates (that is, it decreases the t-statistics). However, the effect of this collinearity will actually serve to dampen the importance of loop price as a determinant of availability, which would make it more likely that the variable of particular concern (*i.e.*, loop price) would be closer to zero (making a finding of "no effect" more likely). Generally, if the coefficient of interest (β_1) is found to be statistically different from zero (the null is rejected), then the analysis concludes that there is insufficient collinearity to require model adjustment.[25] Interestingly, the fact that the analysis finds a relationship between broadband availability and loop rates even with this collinearity bolsters confidence in the results.

B. *Summary of Results*

The results of the estimation and descriptive statistics are summarized in Table 1. Table 1 shows a number of interesting relationships between broadband availability and various factors, including rural population, time, and, of particular interest to this study, unbundled loop prices. The regressions explain large percentages of the variation in the availability (of both types) across states (the unweighted R-squares are 0.63 and 0.78, respectively).[26]

Both broadband availability and competitiveness appear to be driven primarily by rural population, time, and unbundled loop prices. All of these variables are statistically significant determinants of the availability (at the 5% level or better) in both models. The results indicate that states with a higher proportion of rural population have less broadband availability, another

[24] *Id.* at 382-3.

[25] *Id.* at 344-5. We also note that the Variance Inflation Factors for both P_L and C_L are less than 10, a number which is generally taken to imply high multicollinearity. *Id.* at 338-9.

[26] Weighted least squares eliminates the constant term, so the analysis reports the unweighted values for R-squared.

unsurprising result. The effect of rural population is large and highly statistically significant. As expected, the time-specific dummy variables indicate that broadband penetration has risen over time (all time dummies measure the difference from June 2002 data).

There are a few differences in the models. For example, there is a negative and marginally statistically significant relationship between the number of large cities in a state and universality, but the variable appears to have no effect on competitiveness. Income is relevant for competitiveness, but not for universality. The sign on the income variable is positive as would be expected and the regressor is statistically different from zero at better than the 10% level.

Turning to important relationship between loop price and our measures of broadband universality and competitiveness, the null hypothesis that the loop price has no effect on is rejected in both models. The coefficient on loop price (β_1) is consistently negative meaning that higher loop prices, holding costs and other factors constant, reduce both the universal and competitive availability of broadband services. For universality (Model 1), the implied elasticity is -0.10 indicating that a 10% decrease in the loop price (other things constant) will lead to a 1% increase in the number of zip codes with at least one broadband provider. At the sample mean, this increase would reduce the percentage of zip codes without broadband service by approximately 9%. At the sample mean, the elasticity of competitiveness with respect to loop price is -0.08.

Table 2 summarizes the effects on broadband availability for each state resulting from a $1 increase in the loop rate. This simulation uses the estimated coefficients from the regression model to predict the reduction in availability of broadband services, based on average population in each state. If loop rates had been higher by $1 across all states, then the model predicts that about 3.6 million households would be unable to purchase broadband services today. It is interesting to note that if all states were to adopt the FCC's 12.95% cost of capital for unbundled elements set in the *Virginia Arbitration Order* (2003), loop prices would, on average, be about $2 higher.[27] Thus, if states had followed the same

[27] *In the Matter of Petition of WorldCom, Inc. Pursuant to Section 252(e)(5) of the Communications Act for Preemption of the Jurisdiction of the Virginia State Corporation Commission Regarding Interconnection Disputes with Verizon Virginia Inc., and for Expedited Arbitration*, Memorandum Opinion and Order, CC Docket No. 00-218 (August 29, 2003) at ¶64. The average cost of capital adopted in states for TELRIC models is about 10%. For every one-percentage point increase in the cost of capital, the loop rate increases by about 5%.

peculiar logic contained in the FCC's *Order* related to the cost of capital, then about seven million households would be without access to broadband services today.

III. Conclusion

This study adds to the mounting work showing that wholesale network access requirements (like unbundling) do not dampen broadband availability or investment incentives more generally. To the contrary, the analysis contained herein strongly shows that states that have established relatively lower rates for unbundled loop access have enjoyed *more* consumer choice and have seen *more* deployment of broadband technology within their borders.

Notwithstanding, the Administration and the FCC in particular recently have made significant efforts to reverse these policies and severely curtail competitive choice for residential and small business telephone consumers based upon flawed analytical foundations and little empirical support. Given the huge stakes involved, however, perhaps it is not too much to ask for policymakers to study and consider the evidence before they decide that a policy is or is not working.

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Table 1. Summary of Econometric Estimates

	Dep. Var. = A_U	Dep. = Var. A_C	
	Coef. (t-stat)	Coef. (t-stat)	Mean[a] [St. Dev]
lnP_L	-0.837 (-2.54)*	-0.333 (-2.99)*	14.70 [4.29]
lnC_L	13.735 (0.31)	-0.047 (-0.35)	14.15 [5.84]
ln*INC*	0.712 (1.19)	0.284 (1.85)**	30.36[a] [22.55]
ln*BIGCITY*	-0.052 (-1.76)**	-0.001 (-0.19)	1.33 [1.98]
RURAL	-3.797 (-5.15)*	-1.704. (-8.34)*	0.28 [0.15]
DQWEST	1.718 (0.62)	0.083 (0.13)	0.28 [0.45]
DVZ	2.375 (0.86)	0.257 (0.39)	0.28 [0.45]
DBLS	2.916 (1.07)	0.533 (0.83)	0.18 [0.39]
DSBC	2.110 (0.79)	0.190 (0.29)	0.16 [0.37]
DAMER	2.053 (0.79)	0.066 (0.11)	0.10 [0.30]
DEC2003	0.873 (7.07)*	0.178 (4.70)*	0.25 [0.43]
JUNE2003	0.564 (4.41)*	0.123 (3.26)*	0.25 [0.43]
DEC2002	0.266 (2.18)*	0.040 (1.06)	0.25 [0.43]
AU	...	...	0.89 [0.10]
AC	...	...	0.41 [0.22]
R^2 (Unwgt)	0.63	0.78	
White χ^2	42.82*	31.13*	
RESET F (Prob.)	0.46 (0.63)	0.17 (0.85)	

* Statistically Significant at the 5% level or better.
** Statistically Significant at the 10% level or better.
[a] Descriptive statistics are not expressed in log form.

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Table 2. Reduction in Household Availability of Broadband for Every $1 Increase in the Unbundled Loop Rate

State	Households Affected	State	Households Affected
Alabama	59,923	Montana	12,384
Alaska	7,533	Nebraska	21,912
Arizona	63,019	Nevada	23,735
Arkansas	35,809	New Hampshire	16,305
California	417,226	New Jersey	106,328
Colorado	56,277	New Mexico	22,944
Connecticut	42,483	New York	239,796
Delaware	9,976	North Carolina	104,814
Dist.of Columbia	8,737	North Dakota	8,462
Florida	214,478	Ohio	149,670
Georgia	105,468	Oklahoma	46,026
Hawaii	13,278	Oregon	44,031
Idaho	16,890	Pennsylvania	162,364
Illinois	157,066	Rhode Island	13,828
Indiana	80,735	South Carolina	53,559
Iowa	39,077	South Dakota	9,941
Kansas	34,743	Tennessee	76,366
Kentucky	55,520	Texas	252,936
Louisiana	56,758	Utah	24,320
Maine	17,475	Vermont	8,325
Maryland	71,412	Virginia	93,634
Massachusetts	82,799	Washington	79,909
Michigan	127,586	West Virginia	25,593
Minnesota	61,884	Wisconsin	69,865
Mississippi	36,429	Wyoming	6,639
Missouri	74,130		

EXHIBIT 8

ASPEN
UBLISHERS

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BEST PATH TO BROADBAND UBIQUITY DEBATED

:egulatory reform - the hot topic in telecom policy circles, whether it be overhauling the intercarrier compensation system or changing the stovepipe" service classification of the 1934 Communications Act - is not necessarily the best way to go about achieving the highest-profile elecom policy objective of the day, increased broadband serv ice penetration, according to Blair Levin, managing director of Legg Mason Wood Valker, Inc.

;peaking this morning at a forum on broadband policy sponsored by the New America Foundation, Mr. Levin, a former FCC chief of staff during ıe chairmanship of Clinton appointee Reed Hundt, suggested that rather than regulatory reform, the government should consider such trategies as adopting e-government applications, leveraging its power as a purchaser of communications services, and hastening the return of nalog TV spectrum, which could be used for wireless broadband services. Eventually, he said, he expected there to be universal broadband ervice support.

ı contrast, panelist Kyle Dixon, director of the Progress & Freedom Foundation's Federal Institute for Regulatory Law and Economics and a ›rmer adviser to FCC Chairman Michael K. Powell, cited several items of regulatory reform - including the replacement of the Act's "outdated egulatory classification" system with "targeted enforcement" - as ways to encourage investment and innovation in broadband services. The narket should be allowed to time to work, he added.

ın audience member suggested that the solution to the broadband penetration issue is for the government to "take over the last mile." Panelist)aniel Berninger, a senior analyst at Tier1 Research and a co-founder of Vonage Holdings Corp., greeted the proposal with enthusiasm, ›ointing to municipalities that have tried to roll out last-mile fiber only to face "incumbents trying to block it." Mr. Levin, however, said, "We are /here we are now. I don't think the government is going to own the last mile."

Ar. Berninger said it was "nonsense" to speak of intermodal competition. Cable modem service is not a substitute for digital subscriber line ervice, because the "maps" of available offerings "don't completely overlap." Even five years down the road, with more cable and DSL ıroadband buildout and increased wireless broadband offerings, there will still be "laggard customers" who will be "abused in areas with less :ompetition," he said. Government has to introduce regulations to keep markets working, he added.

ın impromptu poll, taken after an attendee suggested that information storage and processing are powerful and cheap enough to substitute for ıroadband transmissions, found audience members evenly divided on the question of whether there is "a broadband problem" at all. - Lynn 3tanton, lstanton@tr.com

'R Daily, September 17, 2004

EXHIBIT 9

Financial News

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Exhibit 9

Reuters

Baby Bells See Rivals Taking Fewer Phones

Thursday September 9, 12:48 pm ET

By Justin Hyde

WASHINGTON (Reuters) - Three of the nation's dominant local telephone companies said on Thursday that they had seen a sharp drop-off in new residential lines leased to competitors since AT&T Corp. (NYSE:T - News) announced a retreat from residential service in July due to changing federal rules.

The three Baby Bells -- Verizon Communications Inc. (NYSE:VZ - News), BellSouth Corp. (NYSE:BLS - News) and Qwest Communications International Inc. (NYSE:Q - News) -- also said they had seen little change in the total number of customers served by lines leased to competitors. But Verizon and BellSouth said they were optimistic about how many customers they could get back over the next few years.

"At the end of the day I think we'll get the bulk of those customers back," said BellSouth Chief Financial Officer Ron Dykes at a Morgan Stanley investment conference in Washington.

AT&T has said its decision to stop marketing its residential services stemmed from changes earlier this year in federal rules governing how much the Baby Bells can charge competitors to lease the copper wires running into homes.

AT&T and other competitors such as MCI Inc. (NasdaqNM:MCIP - News) contended those changes would lead to price hikes from the Baby Bells and make reselling lines too expensive. MCI has said it would consider cutting back on residential marketing in some regions, but has not specified the scope of any cuts.

Industry executives and analysts have said due to the rule changes, the Baby Bells could recapture most of the 17 million local lines that competitors now lease under federal rules, boosting earnings.

Verizon Chief Financial Officer Doreen Toben told the Morgan Stanley conference that Verizon has seen "a marked decrease in amount of new (competitor-leased) lines, especially residential," from AT&T and MCI.

"That said, we do have a base of about six million (leased lines) where we've yet to see any reduction in absolute numbers," she said.

Qwest Chairman and Chief Executive Richard Notebaert said at the same conference that Qwest had seen a roughly 50 percent drop last month in new residential lines leased to competitors over the previous month.

Morgan Stanley's Dykes said BellSouth had also seen an impact "from AT&T, with their visible withdrawal, as well as MCI with their less visible withdrawal."

AT&T's retreat from residential phone services put the dominant local phone companies on the attack and gave their lagging stocks a jolt of popularity among investors and analysts. The Bells have long maintained that the federal-set rates for leasing lines to competitors were below their costs, and Bell executives have said every residential telephone line they get back from a competitor adds roughly $20 per month to profits.

Toben said Verizon was having an internal debate about how many of the roughly 3.6 million residential lines leased by its competitors it might be able to eventually win back over the next several years, with some estimates running as high as 80 percent.

EXHIBIT 10

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Filed in Docket 28607 as Exhibit JPG 2.2

Distribution of MM UNE-L Lines -- Austin Round Rock MSA

Austin-Round Rock, TX Metropolitan Statistical Area

	Markert Share of Claimed UNE-L Trigger Candidates (A through K)									
Wire Center	**A**	**B**	**C**	**D**	**E**	**F**	**H**	**I**	**J**	**K**
AUSTTXHI	1.6%	0.3%		0.2%		0.2%		0.1%	0.7%	0.9%
AUSTTXHO	1.7%	0.8%		0.2%		0.3%			0.1%	0.9%
AUSTTXRR						0.1%				0.8%
AUSTTXGR	1.1%	0.5%		0.2%		0.2%		0.2%	0.6%	1.2%
AUSTTXJO	0.8%					0.3%				0.6%
AUSTTXTE	1.0%	0.2%		0.1%		0.2%		0.2%	0.3%	0.5%
AUSTTXFI	0.7%	0.2%		0.1%				0.2%	0.2%	0.5%
AUSTTXPF										
AUSTTXFA	0.2%	0.2%				0.1%				0.4%
AUSTTXMC										
AUSTTXWA										
AUSTTXLE										
AUSTTXCV										
AUSTTXEV									0.1%	
AUSTTXTW										
BSTRTXBS										
AUSTTXBC										
LCKHTXLK										
TAYLTXTA										
AUSTTXLT										
AUSTTXLW										
AUSTTXMF										
ELGNTXEL										
AUSTTXMA										
AUSTTXBE										
SMVLTXSM										
LLNGTXLU										
LBHLTXLH										
AUSTTXCR										
AUSTTXGK										
AUSUTX78										
AUSUTXNI										
RDRKTX02										
SMRCTXXA										
Total	**0.1%**	**0.0%**	**0.0%**	**0.0%**	**0.0%**	**0.0%**	**0.0%**	**0.0%**	**0.0%**	**0.1%**

Filed in Docket 28607 as Exhibit JPG 2.3
Distribution of MM UNE-L Lines -- Corpus Christi MSA

Corpus Christi, TX Metropolitan Statistical Area

	Markert Share of Claimed UNE-L Trigger Candidates (A through K)									
Wire Center	**A**	**B**	**C**	**D**	**E**	**F**	**H**	**I**	**J**	**K**
CRCHTXTE				0.6%	0.9%					
CRCHTXTU				0.5%	1.2%					
CRCHTXWY					0.3%					
RCPTTXRP										
CRCHTXCA										
CRCHTXFB										
CRCHTXBU										
MTHSTXMA										
CRCHTXPD										
SINTTXSI										
CRCHTX93										
Total	**0.0%**	**0.0%**	**0.0%**	**0.1%**	**0.1%**	**0.0%**	**0.0%**	**0.0%**	**0.0%**	**0.0%**

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Exhibit 10

Filed in Docket 28607 as Exhibit JPG 2.4

Distribution of MM UNE-L Lines – Dallas-Fort Worth MSA

Dallas-Fort Worth-Arlington, TX Metropolitan Statistical Area

	Markert Share of Claimed UNE-L Trigger Candidates (A through K)									
Wire Center	**A**	**B**	**C**	**D**	**E**	**F**	**H**	**I**	**J**	**K**
DLLSTXRN	2.4%	1.2%	0.3%			0.7%		0.4%	1.1%	0.8%
DLLSTXAD	2.4%	1.0%	0.3%			1.0%		0.6%	1.2%	0.9%
FTWOTXCR	2.1%	0.1%	0.4%			0.7%		0.1%		2.0%
DLLSTXEM	1.4%	1.3%	0.1%			0.5%			0.7%	0.5%
FTWOTXBU	1.6%					0.4%	0.1%			0.9%
DLLSTXRI	0.9%	0.9%				0.2%		0.1%	0.7%	0.4%
DLLSTXNO	0.5%	0.5%	0.1%			0.1%			0.3%	0.2%
ALLNTXSA						0.1%				
FTWOTXEU	1.0%	0.3%	0.2%			0.3%				1.2%
FTWOTXED	1.2%		0.2%			0.4%			0.1%	0.5%
DLLSTXRE	1.1%		0.3%			0.4%			0.3%	0.6%
DLLSTXTA	0.9%	1.3%				0.3%		0.2%	0.5%	0.2%
FTWOTXAR	0.8%					0.3%		0.1%		0.5%
DLLSTXFL	1.4%	1.6%				0.5%			0.8%	0.5%
DLLSTXDI	1.0%									0.5%
DLLSTXMC	1.7%	0.6%	0.2%			0.2%				0.6%
DLLSTXLA	0.9%					0.2%		0.2%	0.4%	0.2%
FTWOTXPE	1.2%					0.6%				0.4%
DLLSTXMS	0.8%									
DLLSTXFB	2.0%	1.2%	0.1%			0.5%		0.2%	0.9%	0.8%
FTWOTXAX										
MCKNTXLI										
DLLSTXDV	0.6%					0.2%				0.3%
FTWOTXWA	0.8%									0.4%
DLLSTXNM	1.4%									
DLLSTXFE	0.5%									0.2%
DLLSTXDA	0.7%									0.1%
FTWOTXGL	0.8%					0.3%				0.3%
DLLSTXME	1.2%	0.9%	0.1%			0.4%		0.1%	0.8%	0.3%
FTWOTXKE	0.3%									0.3%
FTWOTXAT	1.3%					0.3%				0.9%
DLLSTXWH	0.4%					0.2%				
DLLSTXFR	0.4%									
DLLSTXRO	0.4%					0.1%			0.5%	0.2%
DLLSTXGP	0.6%	1.2%				0.2%				0.4%
FRSCTXES										
FTWOTXJE	0.7%									
WTFRTXLY										
CLBNTXMI										
FTWOTXMA	1.2%									0.2%
FTWOTXTE	1.1%									0.2%
FTWOTXCE										
FTWOTXBR										
FTWOTXBN										

Filed in Docket 28607 as Exhibit JPG 2.4
Distribution of MM UNE-L Lines -- Dallas-Fort Worth MSA

Dallas-Fort Worth-Arlington, TX Metropolitan Statistical Area - Continued

	Markert Share of Claimed UNE-L Trigger Candidates (A through K)									
Wire Center	**A**	**B**	**C**	**D**	**E**	**F**	**H**	**I**	**J**	**K**
RKWLTXPA										
DLLSTXDS										
WXHCTXWE										
RONKTXWO						0.1%				
FTWOTXEC										
GNVLTXGL										
DLLSTXCH										
FTWOTXCI										
DLLSTXEV										
DLLSTXRY										
DLLSTXEX										
DLLSTXHA										
FTWOTXCP										
DLLSTXDN										
TRRLTXJO										
FRSCTXCO										
FTWOTXLW										
FTWOTXWS										
ENNSTXTR										
MDLTTXGR										
DLLSTXLN										
RDOKTXHO										
DLLSTXSE										
DLLSTXSU										
FTWOTXBB										
ALVDTXTI										
FRNYTXHI										
FTWOTXBY										
FTWOTXAL										
DLLSTXHU										
FRSCTXWE										
FTWOTXBE										
RYCYTXNE										
ABRYTXGI										
PRTNTXRE										
FRVLTXST										
CELNTXDU										
PRSPTXFI										
ANNATXWA										
MCKNTXTE										
NWRKTXHU										
RONKTXAF										
ITLYTXHU										
WFCYTXGY										

Dallas-Fort Worth-Arlington, TX Metropolitan Statistical Area - Continued

	Markert Share of Claimed UNE-L Trigger Candidates (A through K)									
Wire Center	**A**	**B**	**C**	**D**	**E**	**F**	**H**	**I**	**J**	**K**
DLLSTX97										
DLLSTXSQ										
DLLSTXTL										
FRSCTXBJ										
Total	**0.1%**	**0.0%**	**0.0%**	**0.0%**	**0.0%**	**0.0%**	**0.0%**	**0.0%**	**0.0%**	**0.1%**

Filed in Docket 28607 as Exhibit JPG 2.5
Distribution of MM UNE-L Lines -- Houston MSA

Houston-Baytown-Sugar Land, TX Metropolitan Statistical Area

	Markert Share of Claimed UNE-L Trigger Candidates (A through K)									
Wire Center	**A**	**B**	**C**	**D**	**E**	**F**	**H**	**I**	**J**	**K**
HSTNTXSU	2.9%	1.3%	0.2%	0.1%		0.4%		0.6%	0.9%	
HSTNTXNA	0.9%	0.7%	0.1%	0.1%		0.2%		0.2%	0.5%	
HSTNTXPR	1.9%	0.9%	0.2%			0.3%				
HSTNTXBU	1.5%	0.6%	0.2%			0.3%				
HSTNTXMO	1.5%	0.4%				0.3%		0.2%	0.6%	
HSTNTXJA	2.1%	1.2%	0.2%	0.1%		0.4%		0.1%	1.0%	
HSTNTXHO	1.6%	0.5%	0.3%			0.3%		0.3%	0.4%	
HSTNTXAL	1.4%	0.3%	0.1%			0.3%				
HSTNTXFA	1.4%	0.7%				0.3%		0.1%		
HSTNTXBA	1.0%	0.2%	0.2%			0.4%		0.2%		
HSTNTXAI	0.8%	0.1%				0.5%				
HSTNTXOV	2.0%	0.7%	0.1%	0.1%		0.4%		0.2%	0.1%	
HSTNTXSA	1.0%							0.1%		
HSTNTXLA										
HSTNTXUN	1.5%	0.4%	0.1%			0.3%			0.1%	
SPRNTXNO										
HSTNTXMC	0.3%								0.1%	0.3%
HSTNTXCL	0.3%	0.7%						0.1%	0.1%	0.4%
HSTNTXCA	0.6%	1.0%	0.1%			0.3%		0.1%	0.1%	0.7%
TBLLTXKL										
HSTNTXOX	1.7%	0.2%						0.1%		0.5%
HSTNTXBR										
HSTNTXHU	1.2%	0.1%	0.2%			0.1%				0.3%
HSTNTXMI	0.8%	0.1%				0.5%				0.5%
HSTNTXAP		0.1%								
HSTNTXOR	0.6%	0.1%								0.1%
HSTNTXPA	0.5%									
SPRNTXSO										0.1%
RSBGTXRR										
HSTNTXAD	0.5%									
HSTNTXGR	0.7%									
HSTNTXGL										0.4%
HSTNTXFR						0.5%				
HSTNTXWA	0.4%									
HSTNTXRE										0.1%
HSTNTXBW										0.4%
HSTNTXDP										0.9%
HSTNTXGP									0.1%	0.6%
TBLLTXTB										
HSTNTXNE										0.8%
HSTNTXPE										0.2%
HSTNTXRI										
HSTNTXWL										
HSTNTXWE										

Filed in Docket 28607 as Exhibit JPG 2.5
Distribution of MM UNE-L Lines -- Houston MSA

Houston-Baytown-Sugar Land, TX Metropolitan Statistical Area - continued

	Markert Share of Claimed UNE-L Trigger Candidates (A through K)									
Wire Center	**A**	**B**	**C**	**D**	**E**	**F**	**H**	**I**	**J**	**K**
GLTNTXSO										0.5%
ALVNTXAL										0.9%
PNHRTXPN										0.7%
HSTNTXEE										
TXCYTXTC										0.2%
HSTNTXLP										0.5%
CYPRTXCY										0.8%
HSTNTXEH										0.1%
CLEVTXCL										
TXCYTXLM										1.1%
HSTNTXCH										
HSTNTXID										0.1%
CLUTTXLJ										0.7%
GLTNTXSH										
AGTNTXTI										
FRPTTXFR										1.6%
SPLDTXSP										0.4%
HSTNTXMA										0.2%
DYTNTXDY										0.2%
CLUTTXCL										
HSTNTXWY										
HSTNTXSE										
SMLKTXSM										
LBRTTXLB										
WLLRTXWL										
SELYTXSE										
BLVLTXBL										
HSTNTXBE										
HMPSTXHM										
GLTNTXWI										
PTBLTXPT										
PRVWTXPR										
VLLDTXVL										
HSTNTXSH										
AGTNTXDA										
HSTDTXBG										
HSTGTXQC										
SGLDTXXD										
SGLDTXXE										
Total	**0.1%**	**0.0%**	**0.0%**	**0.0%**	**0.0%**	**0.0%**	**0.0%**	**0.0%**	**0.0%**	**0.1%**

Filed in Docket 28607 as Exhibit JPG 2.6
Distribution of MM UNE-L Lines -- San Antonio MSA

San Antonio, TX Metropolitan Statistical Area

	Markert Share of Claimed UNE-L Trigger Candidates (A through K)									
Wire Center	**A**	**B**	**C**	**D**	**E**	**F**	**H**	**I**	**J**	**K**
SNANTXCA	1.3%	0.4%		0.2%		0.7%		0.2%	0.2%	0.8%
SNANTXCU	1.0%	0.2%				2.0%				0.5%
SNANTXFR	1.7%	0.2%		0.1%		1.4%			0.3%	1.2%
SNANTXWE	1.5%	0.2%				1.7%				0.4%
SNANTXDI	1.6%	0.4%				1.0%			0.2%	1.2%
SNANTXTA	1.3%	0.2%				0.9%				0.8%
SNANTXBA	0.5%	0.2%				0.8%		0.1%		0.3%
SNANTXWA	1.4%					1.2%				
SNANTXPE	1.0%					0.9%			0.2%	1.1%
SNANTXGE	0.6%									
SNANTXLA	0.4%					1.3%				
NBRNTXNB										
SNANTXUC										
SNANTXSL										
SNANTXLE	0.5%									0.3%
SGINTXSG										
SNANTXMA										
SNANTXED	0.5%									
SNANTXMC									0.1%	0.1%
SNANTXHE										
SNANTXFO										
SNANTXLS										
PLTNTXPL										
HONDTXHO										
SNANTXIC										
DEVNTXDV										
SNANTXTH										
SNANTXSO										
BNDRTXBD										
CSVLTXCT										
LYTLTXLY										
PTETTXPO										
SNANTXPA										
SNANTXJA										
MARNTXMR										
SNANTXSA										
PCRKTXPC										
SGINTXMQ										
MDLKTXML										
SNANTXSH										
LCSTTXLC										
CHRSTXCH										
CMTNTXCB										
SNANTX81										
Total	**0.1%**	**0.0%**	**0.0%**	**0.0%**	**0.0%**	**0.1%**	**0.0%**	**0.0%**	**0.0%**	**0.1%**

EXHIBIT 11

The Pace Coalition, *et al.*
October 4, 2004
Exhibit 11

Filed in Docket 03-0595 as Exhibit JPG-2

Mass Market UNE-L Activity SBC Claims Supports the Elimination of UNE-P in Chicago MSA

Wire Center	Markert Share of Claimed UNE-L Trigger Candidates (A through J)								
CLLI	A	B	C	D	E	F	H	I	J
ALGNILAQ									
ANTCILAC									
ARLHILAH	0.2%	0.3%		0.5%	0.3%			0.0%	0.0%
AURRILAE									
AURRILAR		0.3%		1.2%	0.7%				
AURRILAW									
BCHRILBC									
BGBKILBK				0.8%					
BGRKILBG									
BLISILBI		0.1%		1.3%	0.1%				
BLWDILBW		0.4%		0.4%	0.8%				
BNSVILBV		0.4%		0.0%	0.3%			0.1%	0.2%
BNTOILAG									
BNTOILBA				1.0%					
BRTLILBT	0.1%			0.9%	0.7%				
BRWDILBR									
CARYILCA									
CHCGILAU	0.0%			0.3%	0.3%				
CHCGILBE		0.2%		0.4%					
CHCGILCA						1.0%			
CHCGILCL	0.0%	0.0%		0.0%				0.0%	
CHCGILDO	0.1%			0.0%	0.1%	1.2%			
CHCGILED	0.2%	0.3%		0.4%	0.2%	5.1%			
CHCGILFR	0.0%	0.0%		0.0%	0.0%			0.0%	
CHCGILHB	0.3%	0.3%		0.5%	0.2%	1.4%			
CHCGILID	0.1%	0.1%		0.1%	0.0%	0.0%		0.0%	
CHCGILIR	0.1%	0.4%		0.5%	0.2%	1.5%			
CHCGILKE		0.5%		0.2%					
CHCGILKI	0.2%	0.3%		0.4%	0.2%				
CHCGILLA	0.1%			0.4%	0.1%	0.6%			
CHCGILLD	0.1%			0.4%					
CHCGILLR		0.0%		0.0%					
CHCGILLW	0.2%	0.2%		0.4%	0.1%	5.4%		0.0%	0.2%
CHCGILME				0.5%	0.3%				
CHCGILMH									
CHCGILMO	0.2%			0.3%	0.1%	0.4%		0.0%	0.1%
CHCGILNE	0.1%	0.3%		0.3%	0.2%				0.0%
CHCGILOH									
CHCGILOK				0.1%		1.9%			
CHCGILPM		0.1%		0.5%	0.1%				
CHCGILPR	0.1%	0.2%		0.5%					
CHCGILPU		0.1%							
CHCGILRP	0.2%	0.5%		0.4%	0.6%	8.0%			
CHCGILSC	0.1%	0.2%		0.3%					
CHCGILST	0.1%	0.1%		0.3%		0.7%			

Mass Market UNE-L Activity SBC Claims Supports the Elimination of UNE-P in Chicago MSA

Wire Center	Markert Share of Claimed UNE-L Trigger Candidates (A through J)								
CLLI	A	B	C	D	E	F	H	I	J
CHCGILSU	0.1%	0.1%		0.1%	0.0%	1.0%		0.0%	0.1%
CHCGILWB	0.1%	0.1%		0.1%	0.0%	0.1%		0.0%	
CHHGILCH									
CICRILCI	0.2%			0.4%	0.3%				
CLCYILCG									
CMCYILCC				1.3%	0.1%				
CRETILCM									
CRLKILCK									
DRFDILDF		0.4%		0.5%	0.2%		0.6%		
DSPLILXL	0.1%	0.3%			0.4%			0.0%	
DWGVILDG	0.1%	0.4%		0.5%	0.2%				
ECHGILEH									
EDNDILDU		0.3%							
EGVGILEG	0.1%	0.2%		0.3%	0.3%			0.1%	
ELBNILEU									
ELGNILEL				1.3%	0.5%				
ELWDILEW									
EMHRILET	0.2%	0.4%		0.5%	0.4%				
EVTNILEV	0.1%	0.5%		0.4%	0.3%				
FRFTILFB									
FXLKILFK									
GENVILGN		0.2%		0.7%	0.2%				
GLELILGE	0.2%			0.5%	0.3%				
GLVWILGV	0.1%	0.0%		0.7%	0.3%				
GRNRILGD									
GURNILAA									
GYLKILGL									
HCHLILHH				1.2%					
HFESILPC									
HFESILWL	0.1%	0.4%		0.4%	0.5%			0.0%	
HGPKILHP	0.1%	0.4%		0.7%			0.8%		
HLSDILHD		0.4%		0.2%	0.4%				
HMPSILHS									
HMWDILHO		0.2%		1.0%	0.2%				
HNDLILHI	0.1%			0.4%	0.2%			0.0%	
HNTLILHO									
HRVRILAI									
HRVYILHA				1.0%	0.2%				
JOLTILJO		0.2%		1.4%					
JOLTILJW		0.3%		1.2%					
KAVLILKA									
LBRDILLM	0.2%	0.6%		0.4%	0.4%			0.0%	
LBVLILLI	0.1%	0.3%		0.6%	0.2%		1.4%		
LCPTILLP									
LEMTILLE									

Mass Market UNE-L Activity SBC Claims Supports the Elimination of UNE-P in Chicago MSA

Wire Center	Markert Share of Claimed UNE-L Trigger Candidates (A through J)								
CLLI	A	B	C	D	E	F	H	I	J
LEMTILLN									
LGRCILLG	0.1%	0.6%		0.4%	0.2%				
LKFRILLF	0.1%			0.6%	0.1%		0.7%		
LKVLILLK									
LKZRILLZ				0.7%					
LNSRILAB									
LSBNILLB									
MAZNILMZ									
MCHNILMY									
MINKILMK									
MNHTILMA									
MOKNILME									
MONEILGK									
MRGVILMG	0.1%	0.1%		0.6%	0.5%				
MRNGILMR									
MRRSILMS									
NBRKILNB	0.1%	0.4%		0.6%	0.3%		0.4%	0.0%	0.0%
NBRKILNT									
NCHCILNC							0.4%		
NPVLILNA	0.1%	0.2%		0.0%	0.2%				
NPVLILNE				0.0%					
NWLNILNL									
NWRKILNW									
OKBRILOA	0.0%	0.0%		0.1%	0.0%			0.0%	
OKLWILOL	0.1%	0.2%		0.6%	0.1%				
OKPKILOP	0.2%			0.5%	0.3%				
ORPKILOR	0.1%	0.0%		0.8%					
OSWGILOS									
PALTILPA	0.1%	0.4%		0.0%	0.5%				
PETNILPT									
PKFSILPF		0.1%		0.6%	0.1%				
PLANILPO									
PLCTILPR									
PLFDILPL									
PLPKILPP				0.9%					
PRRGILXL	0.0%	0.3%		0.2%	0.2%				0.0%
PTVLILPV									
RMVLILRM									
RNLKILRL									
RSLLILRZ	0.2%			0.6%	0.6%				
RVDLILRD		0.1%		0.6%					
RVGVILRG	0.1%			0.5%	0.4%				
SCBGILCO	0.1%	0.1%		0.1%	0.2%			0.0%	
SCBGILRS									
SCPKILSP				0.3%	0.2%				

Mass Market UNE-L Activity SBC Claims Supports the Elimination of UNE-P in Chicago MSA

Wire Center	Markert Share of Claimed UNE-L Trigger Candidates (A through J)								
CLLI	A	B	C	D	E	F	H	I	J
SGGVILSV									
SKOKILSK	0.2%	0.2%	0.0%	0.6%	0.4%	1.6%		0.0%	
SMMTILSM		0.4%		0.3%	0.1%				
TNPKILTP	0.1%			0.7%	0.1%				
UNINILUN									
VNHLILAF									
VRNAILVE									
WCHCILWC		0.2%		0.9%					
WCNDILWU									
WDSTILWS									
WHTNILWH	0.1%	0.2%		0.5%	0.3%				
WKGNILWK	0.1%			0.8%	0.2%		0.0%		
WLMGILWM									
WLMTILWI				0.7%					
WLNGILWG	0.1%	0.3%		0.5%	0.4%		0.7%	0.0%	
WNTKILWN	0.1%			0.4%	0.1%				
WNVLILWV									
YRVLILYO									
ZIONILZN		0.3%							
Total	**0.1%**	**0.2%**	**0.0%**	**0.4%**	**0.2%**	**0.4%**	**0.0%**	**0.0%**	**0.0%**

Total for MSA **1.3%**

Source: WCD-6 (SBC Ilinois Exhibit 1.0 Deere)